

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:  GREAT PLAINS EXPLORATION, LLC  Debtor.  GREAT PLAINS EXPLORATION, LLC  Movant,  v.  NO RESPONDENTS.	Bankruptcy No. 12-10058-TPA Chapter 11  Related to Doc: 744 & 751  Hearing Date: January 27, 2014 Time: 2:30pm  Response Deadline: January 21, 2014
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**DEBTOR'S MOTION TO CONTINUE HEARING ON THIRD AMENDED  
DISCLOSURE STATEMENT AND TO EXTEND DEADLINE FOR OBJECTIONS**

AND NOW comes the Debtor in Possession, by its counsel, and moves the Court as follows:

1. On or about, December 2, 2013, Debtor filed its Third Amended Plan and Disclosure Statement Dated December 2, 2013.
2. By Order of Court dated December 13, 2013 (Doc. 751) the Court set a Hearing on the Debtor's Third Amended Disclosure Statement for January 27, 2014.
3. By that same Order, the Court set January 21, 2014 as the last day for filing and serving Objections to the Third Amended Disclosure Statement.
4. By that same Order, the Court set January 6, 2014 as the deadline for the Debtor to file a Statement related to any releases or exculpations contained in the Third Amended Plan. Debtor filed the required Statement on January 6, 2014.
5. The centerpiece of the Debtor's Third Amended Plan is a proposed private sale of assets.

6. The proposed purchased of the assets of the Debtor (and of the related Debtors) will be again considered by the proposed buyer at its regularly scheduled board meeting, to be held on January 29, 2014. Unfortunately, the Debtor has been unable to convince the proposed buyer to arrange for the meeting to be rescheduled to an earlier date.

7. Because the sale is essential to the Debtor's Plan, as filed, the Debtor believes that it will be in the interests of the Creditors and the Estate if the Disclosure hearing (and the deadline for filing Objections) is extended by 30 days.

8. Debtor believes that its Plan will ultimately be confirmed, if it can finalize an agreement for sale to this buyer. The extension of the Objection date will reduce the expense of the case and of the Creditors, by eliminating the need to file Objections in advance of the January 27<sup>th</sup> hearing.

WHEREFORE, Movant, prays for the entry of Order continuing the hearing on the Debtor's Third Amended Disclosure Statement for approximately 30 days from January 27, 2014, and extending the last day for filing Objections to the Third Amended Disclosure Statement accordingly.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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Dated: January 16, 2014